

1 KARISH & BJORGUM PC
2 A. Eric Bjorgum (State Bar No. 198392)
eric.bjorgum@kb-ip.com
3 Armand Andonian (State Bar No. 252608)
119 E. Union St., Suite B
4 Pasadena, CA 91103
Telephone: (213) 785-8070
5 Facsimile: (626) 795-6321

6 Attorneys for Plaintiff
TACORI ENTERPRISES
7

8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 TACORI ENTERPRISES,) Case No. 2:22-cv-3739
11 Plaintiff,)
12 v.)
13 BLUE NILE, INC.; KGK JEWELLERY)
MANUFACTURING LTD; GOLDSTAR)
JEWELLERY LLC; and DOES 1-10,)
14 Defendants.)
15 _____)
16)
17)
18)
19)

20 Plaintiff, Tacori Enterprises (“Tacori”), by and through its attorneys, Karish & Bjorgum, PC, files its complaint against Blue Nile, Inc., KGK Jewellery Manufacturing Ltd. and Goldstar Jewellery LLC (collectively “Defendants”) for injunctive relief and damages as follows:

21 **Subject Matter Jurisdiction and Venue**

22 1. This case is a civil action arising under the Trademark and Copyright Laws of
the United States, 15 U.S.C. §§ 1051, *et seq.*, and 17 U.S.C. §§ 101, *et seq.*, respectively.
This Court has subject matter jurisdiction over the claims in this Complaint which relate to
copyright infringement and trade dress infringement pursuant to 15 U.S.C. § 1121, 17
U.S.C. § 501 and 28 U.S.C. §§ 1331 and 1338(a).

23 2. This Court has supplemental jurisdiction over the claims in this Complaint
that arise under state statutory and common law of the State of California pursuant to 28
U.S.C. § 1337(a), because the state law claims are so related to the federal claims that they

1 form part of the same case or controversy and derive from a common nucleus of operative
2 facts.

3 3. Venue is proper in this court pursuant to 28 U.S.C. §§ 1391(b) and (c) because
4 a substantial part of the events giving rise to Tacori's claims occurred in this district and
5 because Defendant is subject to personal jurisdiction in this district.

6 **Parties and Personal Jurisdiction**

7 4. Plaintiff Tacori Enterprises is a California corporation with its principal place
8 of business at 1736 Gardena Avenue, Glendale, California.

9 5. Defendant Blue Nile, Inc. ("Blue Nile") is a Delaware corporation with its
10 principal place of business at 3380 146th PL SE, Suite 400, Bellevue, Washington 98007.

11 6. Upon information and belief, Defendant KGK Jewellery Manufacturing Ltd.
12 ("KGK") is a subsidiary of the multinational KGK Group headquartered in Hong Kong with
13 office in the state of New York.

14 7. Defendant Goldstar Jewellery LLC ("Goldstar") is a New York limited
15 liability company with its principal place of business at 20 W. 37th Street, 7th Floor, New
16 York, NY 10018.

17 8. This Court has personal jurisdiction over Defendants because Defendants
18 transact business affairs in this Judicial District, derives substantial revenue from
19 transacting business within this Judicial District, and have substantial contacts with this
20 Judicial District.

21 **The Business of Plaintiff Tacori Enterprises**

22 9. For over 35 years, Tacori has been an innovator in the design, creation, and
23 marketing of fine jewelry. Tacori designs its own jewelry and has created exclusive
24 collections from top quality platinum and gold.

25 10. Among Tacori's original jewelry designs are pieces of jewelry which contain
26 crescents (collectively the "Tacori Crescent Jewelry"). Each piece of the Tacori Crescent
27 Jewelry is an original design comprising copyrightable subject matter under the laws of the
28 United States.

1 11. At all relevant times, Tacori complied in all respects with the Copyright Act,
2 17 U.S.C. § 101, *et seq.*, and secured the exclusive rights and privileges in and to the
3 copyright in the Tacori Crescent Jewelry. Each piece of the Tacori Crescent Jewelry is an
4 original work copyrightable under the Copyright Act, and has been copyrighted in full
5 compliance with the Copyright Act.

6 12. Tacori has received Certificates of Registration and Supplemental
7 Registrations from the Register of Copyrights for the Tacori Crescent Jewelry. The
8 Copyright Registrations for the copyrights infringed by Defendant are attached to this
9 Complaint as Exhibit A.

10 13. Since its creation, the Tacori Crescent Jewelry has been manufactured by
11 Tacori, or under its authority.

12 14. Since the creation of the Tacori Crescent Jewelry, Tacori has been and still is
13 the sole proprietor of all rights, title and interest in and to the copyrights in the Tacori
14 Crescent Jewelry and the Certificates of Registration corresponding therewith.

15 15. Tacori introduced the first of its distinctive and unique Tacori Crescent
16 Jewelry in 1999.

17 16. Since the introduction of its first distinctive Tacori Crescent Jewelry, Tacori
18 has introduced additional rings and other types of jewelry, all of which incorporate the
19 same distinctive design elements, referred to in this Complaint as the “Tacori Crescent
20 Trade Dress.” The Tacori Crescent Trade Dress, as it applies to rings and some pieces of
21 jewelry, is defined as “. . . the appearance of portions of two essentially concentric rings,
22 with one of the rings having a larger diameter than the other. Embedded between the rings
23 are repeating semi-circles or arcs which appear contiguous to each other. A space is created
24 between the contiguous semi-circles or arcs.” Tacori owns a United States trademark
25 registration for the Tacori Crescent Trade Dress, Registration No. 3,728,425. A copy of
26 the Registration Certificate for this registration is attached to this Complaint as Exhibit B.

27 17. Tacori has introduced other rings and other types of jewelry, all of which
28 incorporate the same distinctive design elements, referred to in this Complaint as the

1 “Tacori Signature Crescent Trademark.” The Tacori Signature Crescent Trademark, as it
2 applies to rings and some pieces of jewelry, “consists of the appearance of portions of two
3 essentially concentric rings, with one of the rings having a larger diameter than the other.
4 Embedded between the concentric rings is an arc. A precious stone may be contained
5 within the arc. At both sides of the arc are two generally triangular openings.” Tacori owns
6 a United States trademark registration for the Tacori Signature Crescent Trademark,
7 Registration No. 5,666,511. A copy of the Registration Certificate for this registration is
8 attached to this Complaint as Exhibit C. The Tacori Crescent Trade Dress and the Tacori
9 Signature Crescent Trademark shall collectively be referred to in this Complaint as the
10 “Tacori Trademarks.”

11 18. Tacori has made and continues to make a substantial investment of time,
12 effort, and expense in the design, manufacturing, and marketing of its jewelry featuring the
13 Tacori Trademarks.

14 19. Tacori advertises jewelry designs that contain the Tacori Trademarks in
15 national publications, such as Cosmopolitan, Elegant Bride, Elle, InStyle, InStyle-
16 Wedding, Marie Claire, Martha Stewart Wedding, Modern Bride, Robb Report, Town &
17 Country, Vogue, and W. Tacori advertises its products, particularly those with the Tacori
18 Trademarks, in trade publications, through its website www.tacori.com and social media
19 channels, including Facebook, Twitter, Instagram, TikTok and YouTube.

20 20. Tacori also advertises extensively through paid digital media outlets including
21 Google ads, Facebook, Instagram, Pinterest and TikTok, search engine optimization using
22 adwords including “Tacori” and “Crescent,” banner ads via lifestyle publication sites
23 including Marie Claire, Who What Wear and the Zoe Report.

24 21. The Tacori Crescent Jewelry bearing the Tacori Trademarks has been sold to
25 retail stores and online throughout the United States. These retail stores display and offer
26 for sale the Tacori Crescent Jewelry in-store, and online for certain retailers, with the Tacori
27 Trademarks to the general public.

28

22. The Tacori Crescent Jewelry featuring the Tacori Trademarks has had outstanding commercial success. As a result, jewelers and the public recognize the Tacori Trademarks as designating an exclusive source, thereby creating a goodwill which inures to Tacori's benefit.

The Business of Defendants

23. Tacori is informed and believes, and on that basis alleges, that Defendant Blue Nile is a retailer of jewelry and is in the business of marketing and selling jewelry.

24. Defendant Blue Nile sells or has sold jewelry through its website www.bluenile.com.

25. Tacori is informed and believes, and on that basis alleges, that Defendant KGK is a wholesale manufacturer and/or retailer of jewelry and/or precious stones to the jewelry industry and is in the business of manufacturing, marketing and selling jewelry and/or precious stones.

26. KGK has been a supplier of Tacori since as early as 2013, and markets its products and services through its website www.kgkgroup.com.

27. Tacori is informed and believes, and on that basis alleges, that Defendant Goldstar is a wholesale manufacturer and/or retailer of jewelry and/or precious stones to the jewelry industry and is in the business of manufacturing, marketing and selling jewelry and/or precious stones.

28. Goldstar markets its products and services through its website www.goldstarjewellery.com.

29. Tacori is informed and believes, and on that basis alleges, that KGK and Goldstar are suppliers of jewelry and/or precious stones to Blue Nile.

30. Tacori is informed and believes, and on that basis alleges, that Defendants operate their jewelry business in direct competition with Tacori's jewelry business.

31. Tacori is informed and believes, and on that basis alleges, that Defendants sell their jewelry to, and actively solicit and seek as customers, the same jewelers and retailers as Tacori.

32. Tacori is informed and believes, and on that basis alleges, that Defendants sell their jewelry to, and actively solicit and seek as consumers, the same consumers as Tacori.

33. Tacori is informed and believes, and on that basis alleges, that Defendants sell their jewelry to jewelers, retailers, and consumers within this Judicial District, and specifically market its jewelry within this Judicial District.

34. Tacori has not authorized Defendants to copy, reproduce, manufacture, duplicate, disseminate, or distribute the Tacori Crescent Jewelry or jewelry with a design that is substantially similar to the Tacori Crescent Jewelry.

35. Tacori has not authorized Defendants to copy, reproduce, manufacture, duplicate, disseminate, or distribute jewelry with a design that is confusingly similar to the Tacori Trademarks.

36. In violation of federal copyright law, Tacori is informed and believes, and on that basis alleges, that Defendants have engaged in the advertisement, manufacture, distribution, duplication and/or sale of infringing copies of the Tacori Crescent Jewelry.

37. In violation of federal and state trademark law, Tacori is informed and believes, and on that basis alleges, that Defendants have engaged in the advertisement, manufacture, distribution, duplication and/or sale of jewelry with designs that are confusingly similar to the Tacori Trademarks.

First Cause of Action

(Copyright Infringement)

38. Tacori realleges and incorporates by reference each of the allegations contained in Paragraphs 1 through 37 of this Complaint as though fully set forth.

39. Defendants' acts constitute infringement of Tacori's copyrights in the Tacori Crescent Jewelry in violation of the Copyright Act, 17 U.S.C. § 101, *et seq.*

40. For example, the Blue Nile Diamond Pave and Milgrain Ring provided by KGK is substantially similar to Tacori's copyrighted ring designs 2620 (Copyright Registration No. VA 1-668-685) and 2638 (Copyright Registration No. VA 1-732-607):



1
2
3
4
5
6
7
8
9
10 Tacori Style No. 2620
11
12
13
14
15
16
17
18



10 Blue Nile Diamond Pave and Milgrain
11 Ring
12
13
14
15
16
17
18



19 Tacori Style No. 2638
20
21
22
23
24
25
26
27
28

41. For further example, the Blue Nile Diamond Pave and Milgrain Profile Wedding Ring provided by KGK is substantially similar to Tacori's copyrighted ring design HT 2229 (Copyright Registration No. VA 1-668-685) and Tacori Style No. HT 2550 B:



10 Tacori Style No. HT 2229



11 Blue Nile Diamond Pave and Milgrain
12 Profile Wedding Ring



13
14 Tacori Style No. HT 2550 B

15
16
17
18
19
20 42. For further example, the Monique Lhuillier Oval Halo ring provided by
21 Goldstar to Blue Nile is substantially similar to Tacori's ring design HT 2516 (Copyright
22 Registration No. VA 1-732-629) and Tacori Style No. HT 2524:
23
24
25
26
27
28



1
2
3
4
5
6
7 Tacori Style No. HT 2516
8
9



10
11
12 Monique Lhuillier Oval Halo
13
14
15
16
17



18
19
20 Tacori Style No. HT 2524
21
22
23
24
25
26
27
28

43. For further example, the Monique Lhuillier Curved Band provided by Goldstar to Blue Nile is substantially similar to Tacori's copyrighted ring design HT 2229 (Copyright Registration No. VA 1-668-685):



10 Tacori Style No. HT 2229



10 Monique Lhuillier Curved Band

14
15 44. For further example, the Goldstar ring design is substantially similar to
16 Tacori's copyrighted ring design 2638 (Copyright Registration No. VA 1-429-104) and
17 Tacori Style No. 2605:



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
TACORI

Tacori Style No. 2638



Goldstar Ring

45. Tacori is informed and believes that Defendants' manufacture, distribution, duplication, offer for sale and/or sale of infringing copies of the Tacori Crescent Jewelry was deliberate, willful, malicious, oppressive, and without regard to Tacori's proprietary rights.

46. Defendants' copyright infringement has caused, and will continue to cause, Tacori to suffer substantial injuries, loss, and damage to its proprietary and exclusive rights to the copyrights in the Tacori Crescent Jewelry and further, has damaged Tacori's business reputation and goodwill, diverted its trade, and caused loss of profits, all in an amount not yet determined. In addition, Tacori is entitled to receive the profits made by Defendants from its wrongful acts pursuant to 17 U.S.C. § 504. Alternatively, Tacori is entitled to recover statutory damages, on election by Tacori, in an amount of up to \$150,000 for each copyrighted work sold, offered for sale or distributed.

47. Defendants' copyright infringement, and the threat of continuing infringement has caused, and will continue to cause Tacori repeated and irreparable injury. It would be difficult to ascertain the amount of money damages that would afford Tacori adequate relief at law for Defendants' acts and continuing acts. Tacori's remedy at law is not adequate to compensate it for the injuries already inflicted and further threatened by Defendant. Therefore, Tacori is entitled to temporary, preliminary and permanent injunctive relief pursuant to 17 U.S.C. § 502, and to an order under 17 U.S.C. § 503 and 28 U.S.C. § 1651(a) that the infringing copies of the Tacori Crescent Jewelry, and all molds by which such infringing copies were produced, be seized, impounded and destroyed.

48. Tacori is also entitled to recover its attorneys' fees and cost of suit pursuant to 17 U.S.C. § 505.

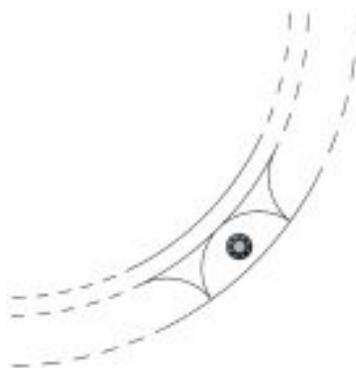
Second Cause of Action

(Trademark Infringement Under 15 U.S.C. § 1114(1))

49. Tacori realleges and incorporates by reference each of the allegations contained in Paragraphs 1 through 48 of this Complaint as though fully set forth here.

50. Defendants' use in commerce of Tacori's federally registered trademark is likely to cause confusion, mistake, or to deceive.

51. For example, the Blue Nile Diamond Pave and Milgrain Ring provided by KGK is confusingly similar to the Tacori Signature Crescent Trademark:

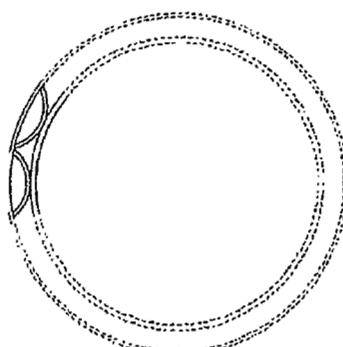


9 Tacori Signature Crescent Trademark
10
11
12
13



10 Blue Nile Diamond Pave and Milgrain
11 Ring
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

52. For further example, the Blue Nile Diamond Pave and Milgrain Profile Wedding Ring provided by KGK ring design is confusingly similar to the Tacori Crescent Trade Dress:

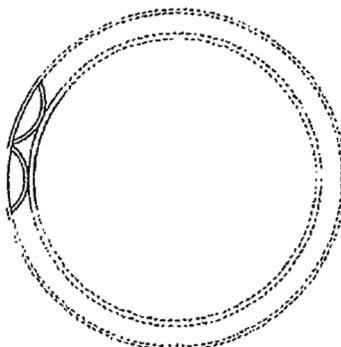


26 Tacori Crescent Trade Dress
27
28



Blue Nile Diamond Pave and Milgrain
Profile Wedding Ring

1 53. For further example, the Monique Lhuillier Oval Halo ring provided by
2 Goldstar to Blue Nile is confusingly similar to the Tacori Crescent Trade Dress:
3
4
5
6
7
8
9
10
11

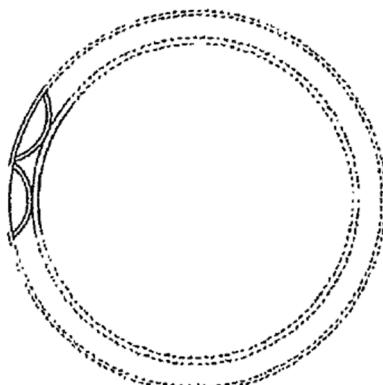


12 Tacori Crescent Trade Dress
13
14



15 Monique Lhuillier Oval Halo
16
17
18
19
20
21
22
23
24
25
26
27
28

54. For further example, the Monique Lhuillier Curved Band provided by
Goldstar to Blue Nile is confusingly similar to the Tacori Crescent Trade Dress:

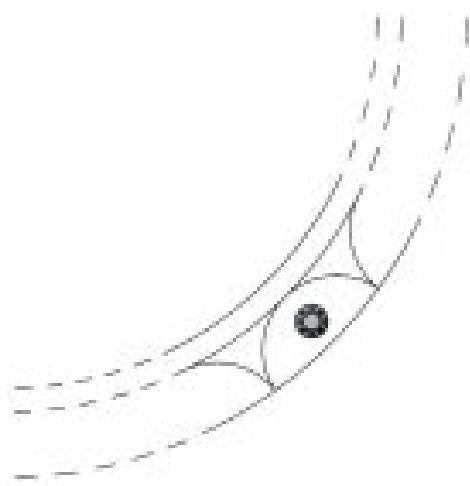


10 Tacori Crescent Trade Dress
11
12
13
14
15



Monique Lhuillier Curved Band
16
17
18
19
20
21
22
23
24
25
26
27
28

55. For further example, the Goldstar ring design is confusingly similar to the
15 Tacori Crescent Trade Dress:



Tacori Signature Crescent Trademark
16
17
18
19
20
21
22
23
24
25
26
27
28



Goldstar Ring
15
COMPLAINT

1
2 56. The above-described acts of the Defendants constitutes trademark
3 infringement in violation of 15 U.S.C. § 1114(1), entitling Tacori to relief.

4 57. Defendants have unfairly profited from the trademark infringement alleged.

5 58. By reason of Defendants' acts of trademark infringement, Tacori has suffered
6 damage to the goodwill associated with the Tacori Trademarks.

7 59. Defendants' acts of trademark infringement have irreparably harmed and, if
8 not enjoined, will continue to irreparably harm Tacori and its federally registered
9 trademark.

10 60. Defendants' acts of trademark infringement have irreparably harmed and, if
11 not enjoined, will continue to irreparably harm the general public who has an interest in
12 being free from confusion, mistake, and deception.

13 61. By reason of Defendants' acts of trademark infringement, Tacori's remedy at
14 law is not adequate to compensate it for the injuries inflicted by the Defendants.
15 Accordingly, Tacori is entitled to injunctive relief pursuant to 15 U.S.C. § 1116.

16 62. By reason of Defendants' willful acts of trademark infringement, Tacori is
17 entitled to damages, and that those damages be trebled under 15 U.S.C. § 1117.

18 63. This is an exceptional case making Tacori eligible for an award of attorneys'
19 fees under 15 U.S.C. § 1117.

20 **Third Cause of Action**

21 (Trademark Infringement and False Designation of Origin

22 Under 15 U.S.C. § 1125(a))

23 64. Tacori realleges and incorporates by reference each of the allegations
24 contained in Paragraphs 1 through 63 of this Complaint as though fully set forth.

25 65. Tacori's jewelry incorporating the Tacori Trademarks has a unique and
26 distinctive design which designates a single source of origin.

66. Defendants' use in commerce of the Tacori Trademarks is likely to cause confusion, or to cause mistake, or to deceive the relevant public that Defendants' goods or service are authorized, sponsored or approved by or are affiliated with Tacori.

67. The above-described acts of Defendants constitutes trade dress infringement of the Tacori Trademarks and false designation of origin in violation of 15 U.S.C. § 1125(a), entitling Tacori to relief.

68. Tacori is being damaged and is likely to be damaged in the future by Defendants' infringement by reason of the likelihood that purchasers of Defendants' goods will be confused or mistaken as to source, sponsorship or affiliation of Defendants' jewelry.

69. Defendants have unfairly profited from the actions alleged herein and will continue to unfairly profit and become unjustly enriched unless and until such conduct is enjoined.

70. By reason of the above-described acts of Defendants, Tacori has suffered and will continue to suffer damage to the goodwill associated with the Tacori Trademarks.

71. The above-described acts of Defendants have irreparably harmed and, if not enjoined, will continue to irreparably harm Tacori and the Tacori Trademarks.

72. The above-described acts of Defendants have irreparably harmed and, if not enjoined, will continue to irreparably harm the general public which has an interest in being free from confusion, mistake, and deception.

73. By reason of the above-described acts of Defendants, Tacori's remedy at law is not adequate to compensate it for the injuries inflicted. Accordingly, Tacori is entitled to entry of injunctive relief pursuant to 15 U.S.C. § 1116.

74. Because the above-described acts of Defendants were willful, Tacori is entitled to damages, and that those damages be trebled, under 15 U.S.C. § 1117.

75. This is an exceptional case making Tacori eligible for an award of attorneys' fees under 15 U.S.C. § 1117.

Fourth Cause of Action

(Violation of California Bus. & Prof. Code Section 17200)

76. Tacori realleges and incorporates by reference each of the allegations contained in Paragraphs 1 through 75 of this Complaint as though fully set forth.

77. Tacori is informed and believes that Defendants are in direct competition with Tacori.

78. Defendants have infringed Tacori's trademark rights and sold infringing products in violation of Tacori's proprietary rights. Such acts constitute unfair trade practices and unfair competition under California Business and Professions Code §§ 17200, *et seq.*, and under the common law of the State of California.

79. Pursuant to California Business and Professions Code § 17203, Defendants are required to disgorge and restore to Tacori all profits and property acquired by means of Defendants' unfair competition with Tacori.

80. Due to the conduct of the Defendants, Tacori has suffered and will continue to suffer irreparable harm. It would be difficult to ascertain the amount of money damages that would afford Tacori adequate relief at law for Defendants' acts and continuing acts. Tacori's remedy at law is not adequate to compensate it for the injuries already inflicted and further threatened by Defendants. Accordingly, Tacori is entitled to temporary, preliminary and permanent injunctive relief pursuant to California Business and Professions Code § 17203.

81. Tacori is informed and believes and on that basis alleges that Defendants' conduct has been intentional and willful and in conscious disregard of Tacori's rights and, therefore, Tacori is entitled to exemplary or punitive damages under the common law of the State of California in an amount appropriate to punish Defendants and to make an example of Defendants to the community.

Prayer for Relief

Therefore, Tacori respectfully requests judgment as follows:

1. That the Court enter a judgment against Defendants that Defendants have:

(a) infringed the rights of Tacori in its federally registered trademark in the Tacori Trademarks in violation of 15 U.S.C. § 1114;

- 1 (b) infringed the trademark rights of Tacori in the Tacori Trademarks in
- 2 violation of 15 U.S.C. § 1125;
- 3 (c) infringed the rights of Tacori in Tacori's federally registered
- 4 copyrights under 17 U.S.C. § 501; and
- 5 (d) competed unfairly with Tacori at common-law and violated Cal. Bus.
- 6 & Prof. Code section 17200.

7 2. That each of the above acts were willful.

8 3. That the Court issue a Temporary Restraining Order and Preliminary
9 Injunction enjoining and restraining Defendants and its respective agents, servants,
10 employees, successors and assigns, and all other persons acting in concert with or in
11 conspiracy with or affiliated with Defendants, from:

- 12 (a) manufacturing, producing, selling, distributing, destroying, altering, or
13 otherwise disposing of any jewelry that is in the possession of
14 Defendants that is confusingly similar to the Tacori Trademarks, or that
15 is substantially similar to the Tacori Crescent Jewelry;
- 16 (b) destroying any documents, electronic files, wax models, molds,
17 business records, or any other tangible object pertaining to the copying,
18 reproduction, manufacture, duplication, distribution, or advertisement
19 of any such jewelry; and,
- 20 (c) engaging in any other activity constituting an infringement of Tacori's
21 trademarks in the Tacori Trademarks or Tacori's copyrights in the
22 Tacori Crescent Jewelry.

23 4. That Tacori be awarded damages for Defendants' trademark and trade dress
24 infringement, and unfair competition.

25 5. That Tacori be awarded Defendants' profits resulting from its infringement of
26 Tacori's trademark and trade dress rights.

27 6. That Defendants be ordered to account for and disgorge to Tacori all amounts
28 by which Defendants have been unjustly enriched by reason of the unlawful acts

1 complained of.

2 7. That damages resulting from Defendants' willful infringement be trebled in
3 accordance with the provisions of 15 U.S.C. § 1117.

4 8. That Tacori be awarded damages for Defendants' copyright infringement
5 either: (i) actual damages in an amount to be determined at trial, together with Defendants'
6 profits derived from its unlawful infringement of Tacori's copyrights; or (ii) statutory
7 damages for each act of infringement in an amount provided by law, as set forth in 17
8 U.S.C. § 504, at Tacori's election before the entry of final judgment, together with
9 prejudgment and post-judgment interest.

10 9. That Tacori be awarded all profits and property acquired by means of
11 Defendants' unfair competition with Tacori.

12 10. That Tacori be awarded exemplary or punitive damages in an amount
13 appropriate to punish Defendants and to make an example of Defendants to the community.

14 11. That the Court issue a Permanent Injunction enjoining and restraining
15 Defendants and its respective agents, servants, employees, successors and assigns, and all
16 other persons acting in concert with or in conspiracy with or affiliated with Defendants,
17 from copying, reproducing, manufacturing, duplicating, disseminating, distributing, or
18 using Tacori's trademark rights in the Tacori Trademarks or infringing copies of the Tacori
19 Crescent Jewelry.

20 12. That the Court issue an Order at the conclusion of the present matter that the
21 jewelry infringing the Tacori Trademarks and all infringing copies of the Tacori Crescent
22 Jewelry, and all molds by which such infringing jewelry was produced, be seized,
23 impounded and destroyed.

24 13. That the Court award Tacori its reasonable attorneys' fees pursuant to 17
25 U.S.C. § 505, 15 U.S.C. § 1117, and any other applicable provision of law.

1
2 14. That the Court award Tacori its costs of suit incurred herein.
3
4 15. That Tacori be awarded such other relief as may be appropriate, including
costs of corrective advertising.
5
6
7

8 DATED: June 1, 2022

9
10
11 By: 
12
13
14

15 KARISH & BJORGUM PC
16 A. Eric Bjorgum (State Bar No.
17 198392)
18 eric.bjorgum@kb-ip.com
19 Armand Andonian (State Bar No.
20 252608)
21 119 E. Union St., Suite B
22 Pasadena, CA 91103
23 Telephone: (213) 785-8070
24 Facsimile: (626) 795-6321
25
26
27
28

29 Attorneys for Plaintiff
30 TACORI ENTERPRISES
31
32
33
34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100
101
102
103
104
105
106
107
108
109
110
111
112
113
114
115
116
117
118
119
120
121
122
123
124
125
126
127
128
129
130
131
132
133
134
135
136
137
138
139
140
141
142
143
144
145
146
147
148
149
150
151
152
153
154
155
156
157
158
159
160
161
162
163
164
165
166
167
168
169
170
171
172
173
174
175
176
177
178
179
180
181
182
183
184
185
186
187
188
189
190
191
192
193
194
195
196
197
198
199
200
201
202
203
204
205
206
207
208
209
210
211
212
213
214
215
216
217
218
219
220
221
222
223
224
225
226
227
228
229
230
231
232
233
234
235
236
237
238
239
240
241
242
243
244
245
246
247
248
249
250
251
252
253
254
255
256
257
258
259
260
261
262
263
264
265
266
267
268
269
270
271
272
273
274
275
276
277
278
279
280
281
282
283
284
285
286
287
288
289
290
291
292
293
294
295
296
297
298
299
300
301
302
303
304
305
306
307
308
309
310
311
312
313
314
315
316
317
318
319
320
321
322
323
324
325
326
327
328
329
330
331
332
333
334
335
336
337
338
339
340
341
342
343
344
345
346
347
348
349
350
351
352
353
354
355
356
357
358
359
360
361
362
363
364
365
366
367
368
369
370
371
372
373
374
375
376
377
378
379
380
381
382
383
384
385
386
387
388
389
390
391
392
393
394
395
396
397
398
399
400
401
402
403
404
405
406
407
408
409
410
411
412
413
414
415
416
417
418
419
420
421
422
423
424
425
426
427
428
429
430
431
432
433
434
435
436
437
438
439
440
441
442
443
444
445
446
447
448
449
450
451
452
453
454
455
456
457
458
459
460
461
462
463
464
465
466
467
468
469
470
471
472
473
474
475
476
477
478
479
480
481
482
483
484
485
486
487
488
489
490
491
492
493
494
495
496
497
498
499
500
501
502
503
504
505
506
507
508
509
510
511
512
513
514
515
516
517
518
519
520
521
522
523
524
525
526
527
528
529
530
531
532
533
534
535
536
537
538
539
540
541
542
543
544
545
546
547
548
549
550
551
552
553
554
555
556
557
558
559
5510
5511
5512
5513
5514
5515
5516
5517
5518
5519
5520
5521
5522
5523
5524
5525
5526
5527
5528
5529
5530
5531
5532
5533
5534
5535
5536
5537
5538
5539
5540
5541
5542
5543
5544
5545
5546
5547
5548
5549
55410
55411
55412
55413
55414
55415
55416
55417
55418
55419
55420
55421
55422
55423
55424
55425
55426
55427
55428
55429
55430
55431
55432
55433
55434
55435
55436
55437
55438
55439
55440
55441
55442
55443
55444
55445
55446
55447
55448
55449
55450
55451
55452
55453
55454
55455
55456
55457
55458
55459
55460
55461
55462
55463
55464
55465
55466
55467
55468
55469
55470
55471
55472
55473
55474
55475
55476
55477
55478
55479
55480
55481
55482
55483
55484
55485
55486
55487
55488
55489
55490
55491
55492
55493
55494
55495
55496
55497
55498
55499
554100
554101
554102
554103
554104
554105
554106
554107
554108
554109
554110
554111
554112
554113
554114
554115
554116
554117
554118
554119
554120
554121
554122
554123
554124
554125
554126
554127
554128
554129
554130
554131
554132
554133
554134
554135
554136
554137
554138
554139
554140
554141
554142
554143
554144
554145
554146
554147
554148
554149
554150
554151
554152
554153
554154
554155
554156
554157
554158
554159
554160
554161
554162
554163
554164
554165
554166
554167
554168
554169
554170
554171
554172
554173
554174
554175
554176
554177
554178
554179
554180
554181
554182
554183
554184
554185
554186
554187
554188
554189
554190
554191
554192
554193
554194
554195
554196
554197
554198
554199
554200
554201
554202
554203
554204
554205
554206
554207
554208
554209
554210
554211
554212
554213
554214
554215
554216
554217
554218
554219
554220
554221
554222
554223
554224
554225
554226
554227
554228
554229
554230
554231
554232
554233
554234
554235
554236
554237
554238
554239
554240
554241
554242
554243
554244
554245
554246
554247
554248
554249
554250
554251
554252
554253
554254
554255
554256
554257
554258
554259
554260
554261
554262
554263
554264
554265
554266
554267
554268
554269
554270
554271
554272
554273
554274
554275
554276
554277
554278
554279
554280
554281
554282
554283
554284
554285
554286
554287
554288
554289
554290
554291
554292
554293
554294
554295
554296
554297
554298
554299
554300
554301
554302
554303
554304
554305
554306
554307
554308
554309
554310
554311
554312
554313
554314
554315
554316
554317
554318
554319
554320
554321
554322
554323
554324
554325
554326
554327
554328
554329
554330
554331
554332
554333
554334
554335
554336
554337
554338
554339
554340
554341
554342
554343
554344
554345
554346
554347
554348
554349
554350
554351
554352
554353
554354
554355
554356
554357
554358
554359
554360
554361
554362
554363
554364
554365
554366
554367
554368
554369
554370
554371
554372
554373
554374
554375
554376
554377
554378
554379
554380
554381
554382
554383
554384
554385
554386
554387
554388
554389
554390
554391
554392
554393
554394
554395
554396
554397
554398
554399
554400
554401
554402
554403
554404
554405
554406
554407
554408
554409
554410
554411
554412
554413
554414
554415
554416
554417
554418
554419
554420
554421
554422
554423
554424
554425
554426
554427
554428
554429
554430
554431
554432
554433
554434
554435
554436
554437
554438
554439
554440
554441
554442
554443
554444
554445
554446
554447
554448
554449
554450
554451
554452
554453
554454
554455
554456
554457
554458
554459
554460
554461
554462
554463
554464
554465
554466
554467
554468
554469
554470
554471
554472
554473
554474
554475
554476
554477
554478
554479
554480
554481
554482
554483
554484
554485
554486
554487
554488
554489
554490
554491
554492
554493
554494
554495
554496
554497
554498
554499
554500
554501
554502
554503
554504
554505
554506
554507
554508
554509
554510
554511
554512
554513
554514
554515
554516
554517
554518
554519
554520
554521
554522
554523
554524
554525
554526
554527
554528
554529
554530
554531
554532
554533
554534
554535
554536
554537
554538
554539
554540
554541
554542
554543
554544
554545
554546
554547
554548
554549
554550
554551
554552
554553
554554
554555
554556
554557
554558
554559
554560
554561
554562
554563
554564
554565
554566
554567
554568
554569
554570
554571
554572
554573
554574
554575
554576
554577
554578
554579
554580
554581
554582
554583
554584
554585
554586
554587
554588
554589
554590
554591
554592
554593
554594
554595
554596
554597
554598
554599
554600
554601
554602
554603
554604
554605
554606
554607
554608
554609
554610
554611
554612
554613
554614
554615
554616
554617
554618
554619
554620
554621
554622
554623
554624
554625
554626
554627
554628
554629
554630
554631
554632
554633
554634
554635
554636
554637
554638
554639
554640
554641
554642
554643
554644
554645
554646
554647
554648
554649
554650
554651
554652
554653
554654
554655
554656
554657
554658
554659
554660
554661
554662
554663
554664
554665
554666
554667
554668
554669
554670
554671
554672
554673
554674
554675
554676
554677
554678
554679
554680
554681
554682
554683
554684
554685
554686
554687
554688
554689
554690
554691
554692
554693
554694
554695
554696
554697
554698
554699
554700
554701
554702
554703
554704
554705
554706
554707
554708
554709
554710
554711
554712
554713
554714
554715
554716
554717
554718
554719
554720
554721
554722
554723
554724
554725
554726
554727
554728
554729
554730
554731
554732
554733
554734
554735
554736
554737
554738
554739
5547340
5547341
5547342
5547343
5547344
5547345
5547346
5547347
5547348
5547349
5547350
5547351
5547352
5547353
5547354
5547355
5547356
5547357
5547358
5547359
5547360
5547361
5547362
5547363
5547364
5547365
5547366
5547367
5547368
5547369
5547370
5547371
5547372
5547373
5547374
5547375
5547376
5547377
5547378
5547379
5547380
5547381
5547382
5547383
5547384
5547385
5547386
5547387
5547388
5547389
5547390
5547391
5547392
5547393
5547394
5547395
5547396
5547397
5547398
5547399
5547400
5547401
5547402
5547403
5547404
5547405
5547406
5547407
5547408
5547409
5547410
5547411
5547412
5547413
5547414
5547415
5547416
5547417
5547418
5547419
55474100
55474101
55474102
55474103
55474104
55474105
55474106
55474107
55474108
55474109
55474110
55474111
55474112
55474113
55474114
55474115
55474116
55474117
55474118
55474119
55474120
55474121
55474122
55474123
55474124
55474125
55474126
55474127
55474128
55474129
55474130
55474131
55474132
55474133
55474134
55474135
55474136
55474137
55474138
55474139
55474140
55474141
55474142
55474143
55474144
55474145
55474146
55474147
55474148
55474149
55474150
55474151
55474152
55474153
55474154
55474155
55474156
55474157
55474158
55474159
55474160
55474161
55474162
55474163
55474164
55474165
55474166
55474167
55474168
55474169
55474170
55474171
55474172
55474173
55474174
55474175
55474176
55474177
55474178
55474179
55474180
55474181
55474182
55474183
55474184
55474185
55474186
55474187
55474188
55474189
55474190
55474191
55474192
55474193
55474194
55474195
55474196
55474197
55474198
55474199
55474100
55474101
55474102
55474103
55474104
55474105
55474106
55474107
55474108
55474109
55474110
55474111
55474112
55474113
55474114
55474115
55474116
55474117
55474118
55474119
55474120
55474121
55474122
55474123
55474124
55474125
55474126
55474127
55474128
55474129
55474130
55474131
55474132
55474133
55474134
55474135
55474136
55474137
55474138
55474139
55474140
55474141
55474142
55474143
55474144
55474145
55474146
55474147
55474148
55474149
55474150
55474151
55474152
55474153
55474154
554741

DEMAND FOR TRIAL BY JURY

Plaintiff Tacori Enterprises hereby demands a trial by jury to decide all issues so triable in this case.

DATED: June 1, 2022

By:

O. C. Kipin

KARISH & BJORGUM PC
A. Eric Bjorgum (State Bar No.
198392)
eric.bjorgum@kb-ip.com
Armand Andonian (State Bar No.
252608)
119 E. Union St., Suite B
Pasadena, CA 91103
Telephone: (213) 785-8070
Facsimile: (626) 795-6321

Attorneys for Plaintiff
TACORI ENTERPRISES